UNITED STATES ENVIRONEMNTAL PROTECTION AGENCY
REGION II

DATE: April 7, 2005

TO: Michael Mintzer, ORC

FROM: Dilshad J. Perera, OSC

SUBJECT: Notes from meeting with Summit Research Labs

Attendees:

- Gary J. Coleman, Director of Operations, Summit Research Labs
- Tony Buzzelle, Summit Research Labs
- Dilshad J. Perera, OSC, 2ERRD-RPB
- David Bofinger, Response Manager, EarthTech (ERRS Contractor)
- Ken Bracken, T&D Coordinator, EarthTech (ERRS Contractor)
- Mark Kromis, Chemist, EarthTech (ERRS Contractor)

Time and Date: 9:00hrs to 10:30hrs. April 7, 2005

- Summit Research Labs (Summit) was initially interested in purchasing the equipment and operations from Westwood Chemical Corp.
- In their initial walk through; Summit noticed containers of silver chloride and totes staged outside.
- Not knowing how much of it was product and how much was waste they chose to sample tanks, totes and soil around the facility in November 2004
- The tank samples were grabbed either from the top and or from the bottom. They were not representative samples.
- Silver, aluminum and zirconium were detected in the soil samples. The highest hit for silver was 50ppm, with concentration varying from 2ppm to 10ppm. The aluminum concentration varied from 20,000 to 40,000ppm.
- Summit agreed that iron was used as a catalyst in the antiperspirant process, but indicated it wasn't at 10% but more like 1,000ppm
- Summit said that because of FDA's cradle to grave, their only option was to ship it off to foreign countries, after sampling and repackaging or reprocess into wastewater flocculent.
- In their past walk through Summit thought that approximately 100,000 gallons of potentially usable product was still present and an additional 50,000-100,000lbs usable dry product, but with little to no "street value"
- Summit came close to buying the facility; they had even lined up transportation to transport the usable material.
- Summit had initially concluded that it may be cheaper to establish a production facility at the site than transport to their facility.
- Summit dealt primarily with Ms. Emma Massett.
- Summit basically gave up in Dec 2004 because they had no idea how to proceed.
- Upon decanting aluminum chlorohydrate, from the reactor vessel, water was added to submerge the unused ingots. If exposed to air, aluminum oxide was generated and will continue to precipitate aluminum oxide, the white slurry we have on site.
- The aluminum and hydrochloric acid reaction was repeated several times, with washing in between to remove iron oxide that retards the reaction. Typically summit said an acid would easily remove the iron oxide
- Copies of analytical reports from the November 2004 sampling event were requested; it was made clear that it was only reference purpose and will not be used for disposal purposes. Summit said they will check with the legal department first.